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ACTION

CORRESPONDENCE CONTROL

STATE OF C

Bill Owens, Governor

Douglas H. Benevento, Acting Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Denver, Colorado 80246-1530 Phone (303) 692-2000 TDD Line (303) 691-7700 Located in Glendale, Colorado

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September 25, 2002

Mr. Joseph A. Legare, Assistant Manager Environment and Stewardship U.S. Department of Energy, RFFO 10808 Highway 93, Unit A Golden, CO 80403-8200

Mr. Stephen Nesta, Environmental Manager Remediation, Industrial D&D, & Site Services Kaiser-Hill Company, L.L.C. Rocky Flats Environmental Technology Site 10808 Highway 93, Unit B, Trailer T-893B Golden, CO 80403-8200

RE: Conditional Approval of Closure Description Document (CDD) for Partial Closure of RCRA Process Waste System Unit 40 in Building 444/447 at the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr. Legare and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has received your notice of intent to partially close RCRA Process Waste System Unit 40 in Building 444/447 and has reviewed the Closure Description Document for Partial Closure of Interim Status Portion of Unit 40 in Building 444/447 - Process Waste Sinks. The Division received this CDD from DOE and Kaiser-Hill on January 14, 2002. Based on discussions with facility representatives, the approval of this CDD was deferred until now. This CDD applies to the process waste sinks, sumps, and associated immediate ancillary equipment located in the following rooms in Building 444: 3, 7, 8, 10, 11, 14, 15, T101A, 109B, 118, 125, 137, 143, 143J, 148A, 150, 183, 203, 205, 206, 210, 212, 212A, 212B, 245, 245C, and the tunnel in the basement. This CDD also applies to the process waste sinks, sumps, and associated immediate ancillary equipment located in the following rooms in Building 447: 31, 31A, 36, 401, 401A, 403, 405, 405B, 406B, 407, 420A, 420B, and 501. Closure of the building floors and structures that serve as secondary containment for Unit 40 is deferred to decommissioning and environmental restoration activities conducted pursuant to the Rocky Flats Cleanup Agreement (RFCA).

As stated in the CDD, the portion of Unit 40 described in the CDD will be closed by the method described as "Unit Removal" in Section E of the approved RCRA Closure Plan for Interim Status Units at RFETS. In accordance with Section B.3 of the approved RCRA Closure Plan for Interim Status Units at RFETS, the Division hereby approves this CDD for the partial closure of RCRA Unit 40 in Building 444/447 with the following conditions:

1. Since the CDD refers to the Integrated Work Control Package (IWCP)/engineering work package for significant details regarding the partial closure of Unit 40, the Division requests that the IWCP/engineering package be provided to the Division for review at least seven (7) calendar days prior to

DIST. BOGENBERGER, V BOGNAR, E. DECK, C. A. DEGENHART, DIETERLE, S. SERMAIN, A. INDSAY, D. C ONG. J. W. NAGEL, R. E. NORTH, K. RODGERS, A. D. SHELTON, D. SPEARS, M.S TRICE, K.D. WORL N.A VILLIAMS, J. 1

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the start of work covered by the CDD. Additionally, if not already included in the IWCP/engineering work package, detailed drawings and/or photographs of the portion of the unit being removed must be provided for Division review at least seven (7) calendar days prior to conducting the work. These drawings/photographs must provide enough detail to describe the boundaries of the portion of the unit being removed.

- Residual liquids encountered in the unit and liquids resulting from the closure activities must be managed
 appropriately as process waste and must not be sent to Building 891 for treatment as indicated in Section
 3.0 of the CDD. Building 891 is authorized to manage remediation waste, but is not authorized to
 manage process wastes.
- 3. Since the CDD also describes non-RCRA decommissioning work (i.e., removal of cabinets and counter tops, disconnection of various plant systems) regulated under the Rocky Flats Cleanup Agreement (RFCA), these activities must be coordinated with Division staff according to the consultative process described in the Decommissioning Program Plan (DPP).
- 4. Since the portion of Unit 40 contained within Building 444/447 will likely be closed by removing sections under separate work plans that will be coordinated with the D&D schedule for the building, the 180-day limit for completing closure activities per Section B.4.b of the approved RCRA Closure Plan for Interim Status Units at RFETS is waived. Closure of the portion of Unit 40 described in this CDD must be scheduled and conducted according to the Integrated Sitewide Baseline. Additionally, a unit-specific closure schedule must be provided to the Division in accordance with Section B.5.d at least seven (7) calendar days prior to the start of closure activities. The unit-specific closure schedule must show how this closure work is integrated with the overall project to decommission and demolish Building 444/447. It is expected that the Division will be notified of any significant changes to the unit-specific closure schedule according to the RFCA consultative process.

If you have any questions concerning this matter, please contact James Hindman at (303) 692-3345.

Sincerely,

Joe Schieffelin, Unit Leader Hazardous Waste Compliance Unit Federal Facilities Program

cc:

S. MacLeod, U.S. DOE-RFFO

A. Rosenman, Kaiser-Hill

D. Shelton, Kaiser-Hill

D. Miller, AGO

T. Rehder, EPA

S. Garcia, City of Broomfield

S. Gunderson, CDPHE

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2/2